

**MCI WORLD COM**

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August 19, 1999

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Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

**RECEIVED**  
**AUG 20 1999**  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

CC Docket No. 99-200/96-98; NSD Nos. L: 97-42 (PA); 98-136 (CA); 99-19  
(MA); 99-21 (NY); 99-27 (ME); 99-33 (FL); 99-55 (TX); 99-62 (CT); 99-64  
(WI)

Dear Ms. Salas:

Today, Hank Hultquist, Mary DeLuca and I met with Dorothy Attwood, legal advisor to Chairman William Kennard regarding the above referenced matters.

In the meetings, MCI WorldCom provided its views on what steps the FCC should take to deal with the important numbering issues now before it. The attached presentation was used to explain the company's position regarding the extent to which states should be granted authority over number administration.

In accordance with section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206 (b)(2), an original and one copy are being filed with your office.

Very truly yours,

  
Bradley C. Stillman

cc: Dorothy Attwood

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# **State Petitions for Numbering Authority**

**MCI WorldCom, Inc**

**August 1999**

**CC Docket No. 99-200, 96-98**

**NSD Nos. L: -97-42(PA), -99-33 (FL), -99-  
27(ME), -98-136 (CA), -99-55(TX), -99-21 (NY),  
-99-19 (MA), -99-62 (CT). -99-64 (WI)**

# State Petitions

- States have sought broad authority over number administration and conservation:
  - pooling, unassigned number porting, extended lotteries, code assignment standards, audits, code reclamation, enforcement, authority to grant extraordinary code requests during rationing, inconsistent rate areas, extended local areas, technology-specific overlays.
- NPRM sought comment on many of these issues.
- Commission should preserve uniform number administration.

# **Grant Additional Authority and Preserve Uniform Administration**

- Limited Unassigned Number Porting;
- Clarify that NANPA should cooperate with states to verify LEC certification;
- Require showing of need for growth code
  - not solely on “fill rate”
  - growth rate and months-to-exhaust are needed
- Clarify that states may obtain data of all code holders.

# Pooling Not Ready for Prime Time

- Current software (NPAC 1.4) not designed for nationwide implementation. Pooling software (NPAC 3.0) available 2H2000;
- NPAC 1.4 requires too many data records to manage effectively beyond Illinois trial;
- Network Reliability may be compromised by record conversion if trial software allowed to proliferate.

# Network Reliability Issues

- Unprecedented NPAC software upgrade;
- Carrier SCP capacity designed for LNP not pooling;
  - carriers may not want to temporarily expand database capacity
  - may slow down porting
- Changes make Public Network unstable.

# Summary

- Limit extent of authority given to states.
- Allow authority until Commission decides national pooling framework.
- Focus on results that reduce the footprint demand.
- Do not move pooling forward with NPAC software, Version 1.4.